

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DENARD ALLISON,

Plaintiff,

-vs-

CITY OF CHICAGO AND
CHICAGO POLICE OFFICERS
PAGAN, #17521 and CORONA, #8159,

Defendants.

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) No. 08 CV ____

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) (*jury demand*)

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FILED: JULY 16, 2008

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08CV4048

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JUDGE SHADUR

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MAGISTRATE JUDGE BROWN

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COMPLAINT

Plaintiff, by counsel, allege as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1343 and 28 U.S.C. §1367.
2. Plaintiff Denard Allison is a resident of the Northern District of Illinois.
3. Defendant City of Chicago is an Illinois municipal corporation. Plaintiff invokes the supplemental jurisdiction of this Court to assert claims against the City. Plaintiff does not assert any federal claim against the municipality.
4. Defendants Pagan, #17521 and Corona, #8159 were at all times relevant acting as Chicago police officers.
5. On April 12, 2008, defendants Pagan and Corona arrested plaintiff.
6. Defendants did not have a lawful basis to arrest plaintiff.

7. Following his arrest, plaintiff remained in custody until May 14, 2008 when he was released without the filing of formal charges.
8. As the direct and proximate result of the above described acts, plaintiff was deprived of his liberty, lost employment opportunities, and was subjected to severe emotional distress.
9. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in his favor and against defendants in an amount in excess of fifty thousand dollars as compensatory damages.

/s/ Kenneth N. Flaxman

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